

Re: written comments on the DS/Adoption 15-008: PROGRAMMATIC LAKE AND STREAM REHABILITATION

FINAL PROGRAMMATIC ENVIRONMENTAL ASSESSMENT for WDFW Statewide Lake and Stream Rehabilitation Program As funded by the USFWS Wildlife and Sportfish Restoration Program September 30, 2008

1.1.4 PG 9: Diamond Lake Final EIS November 2004, US Forest Service, Umpqua National Forest <http://www.fs.fed.us/r6/umpqua/projects/projectdocs/diamondlkresto/#feis>

Comment: This link only takes you to the home page of the Umpqua National forest.

1.1.4 PG 9 :Davis Lake Final EIS – January 2007, California Department of Fish and Game <http://www.dfg.ca.gov/lakedavis/EIR-EIS/>

Comment: This Link is not a valid site

1.1.4 PG 9: Utah Native Trout Restoration Final Environmental Assessment – August 2007, USFWS
http://www.fws.gov/mountainprairie/federalassistance/native_trout/UTAH_FINAL_CU_TT_EA_807.pdf

Comment: This link is no longer valid

General comments on FINAL PROGRAMMATIC ENVIRONMENTAL ASSESSMENT

Comment: Two issues that have come up since the 2008 that are not addressed in this document are;

- 1.) Water quality as it relates to reservoir treatments and agriculture in regards to the new adopted rules on irrigation water quality and food process. Agriculture is an important industry in the state of Washington and plays a far more important role in the state's economy then fishing. 93% of the formulation of the Rotenone is Inert Ingredients. Laws on irrigation water have changed since 2008 and any effects to the irrigation water quality from Rotenone, inert Ingredients, and Bacteria need to be addressed as they relate to irrigation water and food production.
- 2.) Aquatic Noxious weeds stimulation and spread from repeated treatment on the same body of water. 55.7% of the waters treated in the state of Washington have received multiple treatments with an average return of 7.74 year. ([2002 EIS Supplemental Impact Statement](#)) It appears that repeated treatments have an effect of acceleration on the growth of noxious weed. Mitigation of noxious weed treatment on waters that receive multiple treatments should be a requirement.

2002 EIS Supplemental Impact Statement

| Pg. 9 2nd paragraph -There is no (alternate: differentiation between reservoirs and lakes) mention of reservoirs. However WDFW has treated reservoirs in the past ex. Leader Lake, Spectacle Lake, Possibly others?

Pg. 16 Crop Irrigation/Potable Water:. Regulations on irrigation water have changed since 2008 and any effects to the irrigation water quality from Rotenone, inert Ingredients, and

Bacteria need to be address as they relate to irrigation water and food production. Simply stating that treatments are generally done outside of the irrigation season, and do not pose a problem, is not sufficient under the post 2008 irrigation water regulations and an update should be incorporated to address and document post treatment effects from the treatment.

1992 EIS Supplemental Impact Statement

Predator/Competitor Pg. 1 In 1992 experienced predator stocking was scarce from 1974 and 1975 research. As of 2015 this section (23 year old data) has not been updated. WDFW has done some stocking of predators. Ex. Tiger trout, channel cat (for sunfish), Tiger Muskie, others?

Netting and Electrofishing. Pg. 2 This section should also be updated as both practices are now going on in the state and a more detailed account should be available including but not limited to the disposition of any fish removed

Pg. 3 **Surface water Lakes can recover from algae blooms, loss of phyot/zooplankton, benthic fauna and changes to taste and odor in two to 12 months.** With a recovery time up to 12 months this take in at least one irrigation season. Research needs to be included on the effects to agriculture irrigation waters under the current water standards of Global Gap.

Pg. 6 **Justification** Times are changing and WDFW has documented an increase in warm water fishing participation: *The number of warmwater anglers increased from an estimated 170,000 in 1968 to 334,000 in 1994. During this same period, the number of warmwater angler-days increased from 2.1 million to almost 6.2 million; the percentage of all resident game fish anglers fishing for warmwater species increased from 52.3% to 62.7%; and the number of Washington anglers indicating a preference for warmwater species increased from 23% to 34.3%. (WDFW Warm water Management plan)* If this trend continued to present day almost 45% would prefer warm water fish and 70% would fish for warm water species. The Justification needs to be updated to current conditions.

Frequency of Rotenone Treatments the 1992 EIS states 473 lakes have been treated and with 240 (55%) treated more then once, Then the 2002 EIS states 508 lakes have been treated with 283 (55.7%) treated more than once. From this we see that 35 lakes were treated from 1992 to 2002 and 43 lakes treated more than once. How is this possible? Also it is hard to believe that the return interval remained at 7.74 years. Frequency of treatments needs to be validated and/or corrected. What about the treatments in the past 12 years?

Pg. 12 **Earth** A data gape was identified in this document and should be researched and should be updated.

General comments on the DS/Adoption 15-008: PROGRAMMATIC LAKE AND STREAM REHABILITATION

WDFW has spent a lot of time and effort in updating the 1992 EIS in regards to the public health issues. However most of the environmental issues are still based on the 1992 EIS which is 20 + years old and in which the WDFW recognized several data gaps. The WDFW had several comments from the DOE and

responded at least 7 times that they would closely with DOE to monitor the effects of rotenone on the environmental issues as time and budget allowed. With 22 years of pre and post monitoring the WDFW should be able to better address the environmental concerns and at least narrow the data gaps that were identified.

When renewing the Programmatic past monitoring results should be incorporated to demonstrate the Departments commitment to filling the identified data gaps.

At least two new issues have come forward since the 2008 EA. Noxious Weeds and irrigation water quality as related to the requirement of Global Gap.

Mitigation standards should be developed for a minimum of the 55.7% of the multiple treated waters. From the research the treatments with Rotenone is at a minimum accelerating the growth of these weeds especially in waters treated every 7.74 years. Also the economic analyzes for proposed treatment should include the cost of reduced use of non-fisherpersons. I.E. swimmers, boater, water-skiers etc.

In this day of internet links in documents many of them are outdated and no longer available. Adopting documents should be gone through so that all the cited information is available and the links are still correct. Several were listed above and there may be more as with the short review time I was not able to check all of them.

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